

6.0 OTHER CEQA/NEPA CONSIDERATIONS

This chapter addresses other considerations required by the CEQA and the NEPA, including the potential for growth-inducing effects of the Program Alternatives; whether there any of the Program Alternatives or their component actions would have unavoidable significant impacts; and the irreversible or irretrievable commitment of resources.

6.1 GROWTH-INDUCING EFFECTS

None of the Program Alternatives for the disposition of the shell mounds would have growth-inducing effects.

6.2 UNAVOIDABLE SIGNIFICANT IMPACTS

There are two types of unavoidable, significant impacts (Class I) that could occur, depending on which Program Alternative is implemented, and on whether ocean disposal of shell mounds sediments were to be allowed:

- Open-water disposal at the LA-2 site, if it occurred under PA1 or PA5a, would have unavoidable significant impacts on water quality due to the release of contaminants in sufficient quantity and concentrations to have significant toxicity and bioaccumulation effects on aquatic and benthic organisms. The more toxic, soluble contaminants would be released into the water column, whereas other constituents (metals, PCBs) would be entrained within the sediments. Disposal of the shell mounds materials at the LA-2 site would be inconsistent with Coastal Plan policies and with EPA and the USACE's designation of the LA-2 site as a repository for clean sediments. Impacts of disposal at LA-2 would also be cumulatively significant for marine water quality and biota.
- The spreading-in-place Program Alternative would also result in the release of toxic contaminants into the water column in the immediate vicinity of the shell mounds sites. Contaminants would be dispersed into the water column and spread about the seafloor, resulting localized toxicity and bioaccumulation effects.

6.3 IRREVERSIBLE/IRRETRIEVABLE COMMITMENT OF RESOURCES

Each of the Program Alternatives except the No Project Alternative requires the expenditure of fossil fuels and other materials to carry out the project. These commitments are relatively minor and not significant. The commitment of marine resources associated with each Program Alternative is of greater concern and is evaluated below.

- PA1, removal of the shell mounds and caissons, would not require an irreversible and irretrievable commitment of resources. Removal of the shell mounds and caissons would have short-term impacts during activities to remove the deposits

1 that resulted from oil and gas production at the sites but it would reestablish
2 natural conditions on the seafloor.

- 3 • PA2, spreading/levelling of the shell mounds and caisson removal, would
4 represent a significant alteration of the seafloor due to the spreading of the shell
5 mound materials and the contaminants they contain. The effect on marine
6 resources is likely to diminish over time, but in the near term would be
7 irreversible and irretrievable.
- 8 • PA3, in-place capping, would represent an irreversible and irretrievable
9 commitment of seafloor habitat at the shell mounds sites, and would also require
10 a long-term commitment of clean sediments for cap replenishment.
- 11 • PA4, in-place modification (enhancement) of shell mounds as artificial reefs,
12 would irreversibly and irretrievably commit the shell mounds sites to the
13 modification of the seafloor by leaving the shell mounds materials in place and
14 armoring them with hard substrate. Historic use of the sites for trawling would be
15 prevented. The benefits of the artificial reefs as habitat for fishes and
16 invertebrates may be considered to offset, at least partially, the loss of soft-
17 bottom habitat.
- 18 • PA5a, constructing an artificial reef around the Hazel caissons after shell mounds
19 removal as in PA1, would restore natural conditions except at the Hazel site,
20 which would be enhanced by reef creation. This would not irreversibly or
21 irretrievably commit marine resources.
- 22 • PA5b, constructing an artificial reef around the Hazel caissons after shell mounds
23 spreading/levelling as in PA2, would entail the same commitment of resources as
24 PA2.
- 25 • PA6, offsite mitigation, would irreversibly and irretrievably commit the shell
26 mounds sites to the modification of the seafloor by leaving the shell mounds
27 materials in place. Historic use of the sites for trawling would be prevented.
28 Natural seafloor habitat would be permanently replaced by the shell mounds, but
29 there would be compensatory restoration and enhancement of shallow subtidal
30 habitat at Carpinteria Marsh.
- 31 • The No Project Alternative would irreversibly and irretrievably commit the shell
32 mounds sites to the modification of the seafloor by leaving the shell mounds
33 materials in place. Historic use of the sites for trawling would be prevented and
34 natural seafloor habitat would be permanently replaced by the shell mounds.